

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

BRAD AMOS,	)	
	)	Case No: 3:21-CV-00923
Plaintiff,	)	
	)	District Judge Richardson
v.	)	
	)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC, et al,	)	
	)	Jury Demand
Defendants.	)	

**JOINT CASE STATUS REPORT & MOTION FOR STATUS CONFERENCE**

In compliance with the Initial Case Management Order (Doc. #26), the parties file this Joint Case Status Report & Motion for Status Conference.

- I. Status of Discovery. The parties have exchanged written discovery and produced documents. Defendants have taken Plaintiff's deposition and Plaintiff has depose a 30(b)(6) witness. Defendants anticipate taking two additional depositions, including Plaintiff's expert witness. Plaintiff anticipates taking six to eight additional depositions, including that of Defendant Dave Ramsey. The discovery deadline is February 15, 2023. Plaintiff requested a 6-week extension on discovery. Defendants agreed to a two-week extension. The parties request a status conference to resolve this issue.
- II. Anticipated Discovery Disputes. Defendants object to the deposition of Dave Ramsey which is currently scheduled for January 31. Plaintiff disputes the appropriateness of a number of Defendants objections to interrogatories, the completeness of these interrogatories and production, and Defendants' claims of work product and privilege in both written discovery and depositions. Plaintiff has postponed all depositions of company witnesses until these disputes are resolved. The parties request a conference

with the Court to resolve these disputes on or before January 20, 2023, given the scheduled deposition of Dave Ramsey. The parties further request an opportunity to file written briefs detailing their respective discovery disputes.

- III. Prospect for Settlement. Per the Court's Order (Doc. #49), the parties have selected a mediator and have scheduled a mediation for March 9, 2023. This same order dated November 30, 2022, instructed Defendants to respond to Plaintiff's settlement demand within fourteen dates of the order. It is Plaintiff's position that Defendants have not responded and instead filed a Notice of Compliance vaguely asserting their compliance with the Court's Order. Plaintiff disputes that Defendants have complied.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I certify that, on January 3, 2023, I caused a copy of the foregoing *Joint Case Status Report & Motion for Status Conference* to be filed via the Court's electronic filing system, which will automatically notify and send a copy to:

Jonathan A. Street  
Brandon Hall  
Lauren Irwin  
THE EMPLOYMENT & CONSUMER LAW GROUP

*Attorneys for Plaintiff*

/s/ Daniel Crowell  
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